

REMARKS

On March 14, 2006, the undersigned and Examiner Boutah discussed the limitations of claim 1 relative to the cited prior art and the specification. The undersigned understood the Examiner to agree that the limitations of claim 1 are supported by the specification and not suggested by the prior art. No agreement was reached in regards to patentability of independent claims 16 and 18 over the prior art. The 35 USC §112, first paragraph, rejection of claim 16 was discussed, and the undersigned understands that the Examiner agreed that changing "substrate" to —card— would overcome the rejection. No agreement was reached as to the propriety of the §112 rejection.

Claim 1 is amended to clarify that a first card is a network interface card and a second card is a file interface card, and that NFS-client remote procedure calls are sent to the second processor arrangement (which is on the second card) via the system bus and remote procedure calls that are not NFS calls are sent to the first network interface card (FIG. 1; p. 4, l. 29; p. 5, l. 4-14).

Claim 16 is amended to change "substrate" to —card— for purposes of clarification and to expedite prosecution. For the reasons set forth below, the amendment is not made for purposes of patentability.

Claim 18 is amended to clarify that the file interface card and the network interface card are individual cards by way of the file interface card and the network interface card having respective connections to the system I/O bus (FIG. 1; p. 4, l. 29).

The rejection of claims 1 and 16 under 35 USC §112, first paragraph, is respectfully traversed. The specification clearly describes the limitations of claim 1 of the second processor arrangement that executes code that implements a standard NFS client protocol, at least one non-standard extension to the NFS client protocol, and a network protocol stack. For example, FIG. 1 shows a first processor 112 on a client system, along with an extended file interface card 114, and FIG. 3 illustrates an example embodiment of a file interface card 114 having a processor 204. The rejection should be withdrawn because these embodiments are clearly described in the specification at p. 4, l. 29 – p. 5, l. 31 and p. 7, l. 19-30.

The specification also clearly describes the limitations of claim 16 of a file interface card that includes a substrate for removable coupling to a system bus and a processor and memory on the substrate. For example, an extended file interface card 114 is shown and described in FIGs. 1 and 3 and on p. 4, l. 29 – p. 5, l. 14 and p. 7, l. 19-30. Furthermore, those skilled in the art will recognize that a “card” is common term used to reference expansion boards, which are printed circuit boards. For example, at <http://webopedia.internet.com>, a card is the same as an expansion board, and an expansion board is a printed circuit board that may be inserted into a computer to give it added capabilities. The specification clearly describes the EFIC (card) as allowing upgrades to legacy systems to take advantage of extensions to NFS (p. 6, l. 3-6). Therefore, those skilled in the art will recognize that the description of a card inherently includes the limitations of the substrate and removable coupling, and the rejection should be withdrawn.

The Office Action does not show that the limitations of claim 1 are suggested by the Abdelnur-Boutcher combination. Claim 1 sets forth first and second cards having the specified circuitry. The interceptor module executes on the first processor arrangement and is coupled to the operating system and to the system bus. The interceptor module intercepts NFS-client remote procedure calls from the NFS client application and sends NFS-client remote procedure calls to the second processor arrangement on the second card via the system bus and sends remote procedure calls that are not NFS calls to the network interface card that is a first card. Neither Abdelnur nor Boutcher suggest that an interceptor module sends NFS-client remote procedure calls to the second processor arrangement on a second card and sends remote procedure calls that are not NFS calls to the network interface card on a first card as claimed. Therefore, the limitations of claim 1 are not shown to be suggested by the Abdelnur-Boutcher combination.

The alleged motivation for making the Abdelnur-Boutcher combination is unsupported by evidence. The alleged motivation to implement a non-standard extension to NFS does not itself suggest the claim limitations of the interceptor module nor the sending of the different remote procedure calls to two different cards. And no

evidence is presented that suggests the two-card approach. Thus, the alleged motivation is improper.

As to claim 16, the Abdelnur-Boutcher combination is not shown to suggest the combination of the substrate having at least one integrated circuit with a bus interface, a processor, a memory, and a network interface circuit arrangement as claimed. It is not apparent which of Abdelnur's elements the Examiner considers to be the claimed substrate. Nor is there is any apparent substrate that includes the claimed circuitry. There is no apparent suggestion that Abdelnur's processor 713, memory 715, and network interface 720, are all on the same substrate as claimed. Furthermore, no evidence is presented to suggest that these elements are on the same substrate. In addition, the claimed memory is configured not only with program code that implements the standard NFS client protocol and an extension to the NFS protocol, but also with code that implements the network protocol stack. There is no apparent teaching that suggests that Abdelnur's memory element 715 contains code that implements the network protocol stack along with the NFS RPC code. Rather, it is Abdelnur's COMM INT 720 that would appear to implement the protocol stack.

The limitations of claim 18 clearly demonstrate that the Abdelnur-Boutcher combination is not shown to suggest the claimed invention. Claim 18 sets forth a data processing system with both a network interface card and a file interface card, both of which are coupled to the system I/O bus. Abdelnur's element 720 of FIG. 7 only shows a communications interface. There is no apparent suggestion of both a network interface card and a file interface card having respective connections to the system I/O bus. Therefore, the Office Action fails to show that claim 18 is unpatentable over the Abdelnur-Boutcher combination.


Other limitations in the claims are not shown to be suggested by the Abdelnur-Boutcher combination. For example, Boutcher teaches supporting different versions of a remote procedure. There is no apparent suggestion of non-standard extensions to a standard NFS client protocol as claimed. Others of the claims include limitations that further refine the limitations of independent claims 1, 16, and 18 as described above. Thus, these limitations are also not shown to be suggested by the Abdelnur-Boutcher combination.

The alleged motivation for making the Abdelnur-Boutcher combination for claims 16 and 18 is deficient as explained above.

Withdrawal of the rejections and reconsideration of the claims are respectfully requested in view of the remarks set forth above. No extension of time is believed to be necessary for consideration of this response. However, if an extension of time is required, please consider this a petition for a sufficient number of months for consideration of this response. If there are any additional fees in connection with this response, please charge Deposit Account No. 50-0996 (HPCO.027PA).

Respectfully submitted,

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